

## **CORRECTIVE AND PREVENTIVE ACTION**

### **1.0 PURPOSE AND SCOPE**

This procedure describes a controlled process for initiating corrective and preventive action in response to externally or internally reported non-conformances that relate to the implementation of the ISO 14001-compliant environmental management system (EMS) established for the City of San Diego, Environmental Services Department, Refuse Disposal Division.

### **2.0 DEFINITIONS**

2.1 Non-conformance - For the purposes of this procedure, a **non-conformance** is defined as a demonstrated lack of compliance with the environmental policy commitments and other mandatory provisions of the RDD's EMS, as documented by RDD's *Environmental Management System Manual* (EMS-M) and the supporting plans and procedures referenced therein.

2.3 Corrective and Preventive Action Requests - Corrective and Preventive Action Request (C/PAR) forms may be initiated by any RDD employee who believes a non-conformance situation exists within RDD. The forms can be sent directly to the EMR or forwarded to the EMR via a Supervisor or Section Manager.

### **3.0 RESPONSIBILITY AND AUTHORITY**

3.1 Deputy Director - is responsible for reviewing open C/PARs, monitoring their progress and ensuring the Section Managers respond to and resolve their issues in a timely manner.

3.2 Environmental Management Representative (EMR) - is responsible for receiving, documenting and responding to C/PARs, forwarding them to the appropriate section and tracking them throughout their lifecycle.

Section Managers – Section Managers and/or Supervisors of the sections determined to have primary responsibility for a non-conformance shall participate with the EMR in the evaluation of the non-conformance, determination of the root cause, determination of appropriate

measures to be taken to correct the immediate situation, and the determination of appropriate

preventive measures that could reasonably be taken to reduce or preclude the likelihood for recurrence of the non-conformance. It is the responsibility of the Section Manager to ensure these corrective and preventive actions are completed within the determined timeframe or report the progress and the revised completion dates to the EMR, prior to the original completion date. Section Managers are also responsible for forwarding Corrective/Preventive Action Requests, initiated by their staff, to the EMR for documentation, response, and retention.

3.3 RDD Employees – all personnel are responsible for bringing suspected non-conformances to the attention of their Supervisors and/or the EMR.

#### **4.0 PROCEDURE**

4.1 Upon receipt of environmental communications (C/PAR, phone call , e-mail, etc.) that indicate a potential non-conforming condition, or upon review of internal or external EMS audit reports, or management review reports that indicate a potential non-conforming condition, the EMR shall make a preliminary determination of whether or not a non-conformance exists.

4.2 For conditions identified through internal or external communications, and for which no non-conformance is determined to exist, the EMR shall make an appropriate verbal or written response to the originator through the processes defined in RDD-SEOP 4.4.3, Communication, and maintain documentation of such action as an environmental record in compliance with Section 5.3 of the RDD EMS-Manual .

If a non-conformance is determined to exist:

4.3 The EMR shall document the non-conformance on a C/PAR form, assign the C/PAR a control number and enter basic C/PAR information on the *C/PAR Tracking Sheet*.

The EMR shall forward a copy of the open C/PAR to the section manager with primary responsibility for the non-conforming condition, and jointly develop appropriate corrective and preventive actions that can be taken to correct the near-term condition, as well as preventive measures that could reasonably be expected to reduce or preclude the likelihood of the recurrence of the non-conformance. Root cause determination and proposed corrective and preventive actions shall be briefly summarized on the C/PAR Action Plan.

Due dates for completion of the proposed corrective and preventive actions shall be established, and the C/PAR Action Plan updated as appropriate to document the EMR and responsible Section Manager or Supervisor's recommendations. Completion dates may be extended as determined necessary by the Section Manager or Supervisor with EMR approval.

These extended dates will be noted on the C/PAR Action Plan in addition to an explanation for the extension.

The EMR shall track the progress of corrective and preventive action completion using the *C/PAR Tracking Sheet*, and verify completion of all required actions. Once completion has been verified, the EMR shall indicate C/PAR closure by signature, and the completed C/PAR, with any attachments, shall be retained as an environmental record in compliance with Section 5.3 of the RDD EMS-M.

Note: This procedure is not to be confused with the site specific corrective action that is driven by process control, safety inspections, and other facility inspections. The site staff will initiate corrective action and maintain records for these site specific corrective actions.

## 5.0 REFERENCES

EMS - Manual Section: 4.4.3 Communication

EMS - Manual Section: 4.5.2 Control of Nonconformance and “Corrective and Preventive” Action

RDD-SEOP 4.4.3 “Communication”

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